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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

ANTHONY WEATHINGTON,
Plaintiff,
vs.
PRINCESS CRUISE LINES, LTD.
Defendants.

CASE NO. 2:17 CV 1196
COMPLAINT FOR DAMAGES
1. NEGLIGENCE
Jury Trial Demanded

I. JURISDICTION

1. This Court has jurisdiction under the United States District Court Central District of California. Jurisdiction is based on a contract pursuant to the passenger ticket entered into between DEFENDANT, PRINCESS CRUISE LINES, LTD , hereinafter referred to as "Princess" and PLAINTIFF, ANTHONY WEATHINGTON which names the place of jurisdiction in the United States District Court, Central District of California.

II. VENUE

2. Venue is proper pursuant to contract pursuant to the passenger ticket entered into between DEFENDANT "PRINCESS" and PLAINTIFF ANTHONY WEATHINGTON which names the place of filing, United States District Court, Central District of California.

COMPLAINT

III. PARTIES

3. Plaintiff, ANTHONY WEATHINGTON, at all times herein mentioned and presently resides in Studio City, California, County of Los Angeles.

4. Defendant, PRINCESS CRUISE LINES, LTD. hereinafter referred to as "Princess" is and at all times herein mentioned herein legal entity authorized and doing business in the State of California and maintains its principal place of business in Santa Clarita, Los Angeles County, California .

5. Plaintiff alleges that all persons working in the Skywalker Lounge on board the vessel was either an employee , agent, and/or a joint venturer, of the defendant , "Princess" and in doing the things herein alleged, was acting within the course and scope of such agency, joint venture, and employment with the advance knowledge, acquiescence or subsequent ratification of each and every remaining defendant and " Princess".

6 Defendant, "Princess" , owns, operates, manages, charters, outfits, maintains and furnishes the "CROWN PRINCESS", a cruise ship as a common carrier of passengers for hire. Plaintiff, , ANTHONY WEATHINGTON boarded the "CROWN PRINCESS" on November 14, 2015, in Los Angeles, California to cruise as a passenger on a 7 Night Mexican Cruise.

IV. FACTS

7. On November 17, 2015 at 1:30 a.m. while dancing on the dance floor in the Skywalker Lounge , a very low lit lounge on board the ship, plaintiff stepped on liquids and debris that were on the dance floor all to which he was unaware of. His foot stuck on the floor which caused his foot to roll and caused his ankle to buckle and fracture.

8. Plaintiff avers that "Princess" by and through its employees and agents at all times knew that the floor was not suitable for dancing in that on occasion its employees would ask

1 the persons on the dance floor to refrain from dancing with drinks in their hand. In spite of
2 the fact that "Princess" knew persons had come onto the dance floor with drinks in hand they
3 were negligent for failing to inspect for liquid on the floor and to clean the floor prior to
4 allowing persons to dance on the dance floor. Plaintiff avers "Princess" had a duty to maintain
5 the floor at all times when people were dancing on the poorly lit dance floor. There were no
6 cones or other warnings that would apprise one that there was or could be liquid or debris on
7 the floor.

8 8. Plaintiff further avers that the defendant participated in the design of the dance floor
9 which is made up of clear , plexiglass, or plastic material, which had a too low coefficient of
10 friction when the floor is wet and that plaintiff believes that others have had similar incidents
11 on the dangerous dance floor.

12 9. The negligence of the defendant consisted of failing to maintain the vessel in a safe,
13 sound and proper condition as hereinbefore alleged; and in failing to warn the plaintiff of the
14 unsafe, improper, defective and dangerous condition of the dance floor.

15 9. That by reason of such injuries plaintiff has suffered and will continue to suffer
16 physical and mental pain all to his damage in an amount to be determined at the time of trial.

17 10. That plaintiff has been compelled to spend large sums of money for medical
18 treatment and care and will require future medical care and surgery and has lost time from
19 work, all to his further damage in a sum to be determined at the time of trial.

20 **REQUEST FOR RELIEF**

21 WHEREFORE, PLAINTIFF, requests judgment against Defendant(s) and each of them
22 as follows:

- 23 1. For general damages according to proof;
- 24 2. For medical expenses, past, present and future according to proof;
- 25 3. For loss of earnings;
- 26 4. For future loss of earnings and earnings capacity;

5. For pre-judgment interest in a sum permitted by law;
6. For costs of suit herein incurred;
7. For such other and further relief as the Court may deem proper.

VII. DEMAND FOR JURY TRIAL

PLAINTIFF hereby requests a jury trial on all issues raised in his complaint.

Dated: February 14, 2017

Law Offices of Miriam J. Lebental

By: 

Miriam J. Lebental, Esq.
Attorney for PLAINTIFF
ANTHONY WEATHINGTON